



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 19, 2019

Jean Killoren
Agent for InCide Technologies, Inc.
Killoren Regulatory Consulting
316 Highland Ave.
Hartford, WI 53027

Subject: Registration Review Label Mitigation for Orthoboric Acid
Product Name: Zone Defense
EPA Registration Number: 44757-3
Application Date: 10/12/2018
Decision Number: 552645

Dear Ms. Killoren:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Boric Acid/Sodium Salts Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

A copy of your label stamped "Accepted" is enclosed. Products shipped after 12 months from the date of this amendment must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions about this letter, please contact Jaclyn Pyne by phone at 703-347-0445, or via email at pyne.jaclyn@epa.gov.

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EPA Reg. No. 44757-3
Decision No. 552645

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington", with a stylized flourish at the end.

Linda Arrington, Branch Chief
Risk Management and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

Enclosure

Orthoboric Acid	Group:	8D	Insecticide
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Zone Defense® Kills Roaches

- [Kills Roaches [(including Palmetto Bugs and Waterbugs)]
- Also Darkling Beetles Ants & Silverfish]

ACTIVE INGREDIENTS:	
Orthoboric Acid	64.0%
OTHER INGREDIENTS	36.0%
Total.....	100.00%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

[See [side] [back] panel for additional Precautionary Statements [and First Aid]

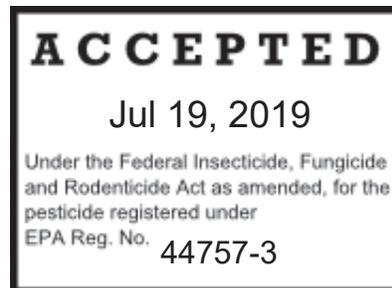
Net Weight: lbs. (kg)

InCide Technologies, Inc.
50 North 41st Avenue
Phoenix, AZ 85009-4618

EPA Reg. No.: 44757-3
EPA Est. No.: 44757-AZ-1
Made in the U.S.A.

1-800-777-4569

Batch Code:



Commercial/Professional**PRECAUTIONARY STATEMENT****HAZARDS TO HUMANS AND DOMESTIC ANIMALS:**

CAUTION: Harmful if swallowed or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear long-sleeve shirt, long pants, shoes and socks. When using pressurized equipment to load and apply dust products to structural building components and poultry houses wear a minimum of a NIOSH-approved particulate filtering facepiece respirator with any N, R or P filter; OR a NIOSH-approved elastomeric particulate respirator with any N, R or P filter; OR a NIOSH-approved powered air purifying respirator with HE filters.

{First Aid statements will be placed in box format, space providing, if not in paragraph format.}

FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have a person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
IF INHALED	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respirations, preferably mouth to mouth if possible. • Call a poison control center or doctor for treatment advice.
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, and then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
Have the product container with you when calling a poison control center or doctor or going for treatment.	

This product may be used in [homes, restaurants, and other food and food handling establishments, markets, schools, warehouses, factories, offices, hotels, motels, hospitals, nursing homes, garages, grocery stores, apartment buildings, new construction, cellulose insulation, cotton batting, industrial plants, theaters, ships, boats, trains, yachts, camps, mobile homes, buses, zoos, kennels, military bases, libraries, utilities, sewers and animal confinement areas].

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Restrictions:

- Children and pets should not be in treatment area until after application is complete.
- Do not treat pets with this product.
- Avoid contamination of feed and foodstuff.
- Avoid contamination of ornamental plants.
- Applications to carpets are prohibited.
- Use of this product for control of bed bugs is prohibited
- For use in poultry houses/industrial/commercial structural building: Do not apply with pressurized application methods except for use with crack and crevice spot, or void treatments.

Commercial/Professional**Resistance-Management Recommendations:**

For resistance management, Zone Defense [this product] contains a Group 8D insecticide. Any ant population may contain individuals naturally resistant to Zone Defense [this product] and other Group 8D insecticides. The resistant individuals may dominate the insect population if this group of insecticides are used repeatedly in the same fields. Appropriate resistance-management strategies should be followed. Monitor after application for unexpected target pest survival. If the level of survival suggests the presence of resistance, consult with your local university specialist or certified pest control advisor.

{for any product requiring a respirator and containing directions for use which includes Non-WPS Use sites}

Respirator fit testing, medical qualification, and training

Using a program that conforms to OSHA's requirements (see 29 CFR Part 1910.134), employers must verify that any handler who uses a respirator is:

- Fit-tested and fit-checked,
- Trained, and
- Examined by a qualified medical practitioner to ensure physical ability to safely wear the style of respirator to be worn. A qualified medical practitioner is a physician or other licensed health care professional who will evaluate the ability of a worker to wear a respirator. The initial evaluation consists of a questionnaire that asks about medical conditions (such as a heart condition) that would be problematic for respirator use. If concerns are identified, then additional evaluations, such as a physical exam, might be necessary. The initial evaluation must be done before respirator use begins. Handlers must be reexamined by a qualified medical practitioner if their health status or respirator style or use-conditions change.
- Upon request by local/state/federal/tribal enforcement personnel, employers must provide documentation demonstrating how they have complied with these requirements.

[DOMESTIC (HOWEOWNER) USE]

Application Directions For Control of Cockroaches, Ants, and Silverfish: Apply liberally, scattering under and behind refrigerator, stove, sink, dishwasher, washing machine and dryer, tubs, into openings around drains, water pipes and electrical conduits; and in cracks and crevices along baseboards and corners of cabinets, cupboards, and closets. Remove all lower draws in kitchen and bathroom cabinets, bedroom dressers and chests of drawers, then scatter liberally in drawer wells. Any powder visible after application must be brushed into cracks crevices or vacuumed. Reapply as necessary.

Directions for Applying as a Mop Solution to Control Cockroaches:

Mixing and Application Directions: Add 1 cup of powder to each gallon of rinse water. Apply to hard floor areas only. Liquid application of this product is prohibited to carpet areas. Make only enough for each application. Supplemental treatment only. Reapply as necessary. Avoid contamination of feed and food stuff. Use of this product for the control of bed bugs is prohibited on carpeting.

[NON-DOMESTIC USE (NONEDIBLE PRODUCT AREAS ONLY)]**Application Directions For Control Of Darkling Beetles (Lesser Mealworms):**

Remove all birds in poultry or layer houses before applying. Using a fertilizer or seed spreader, uniformly apply Zone Defense® powder at the rate of 1 to 2 pounds per 100 sq. ft. over old litter or soil surface of the poultry house. Liberally dust side walls, posts, top plates, and framing. Apply powder in cracks and crevices around insulation on the floor and sidewalls. Zone Defense® can also be spray applied wet when mixed 1 to 2 pounds per three gallons of water for each 100 square feet of surface to be treated. Use hand-operated pump or backpack sprayers when applying wet formulations. **DO NOT APPLY DIRECTLY TO MANURE.** Evenly spread fresh litter a minimum of four inches over all treated floor surfaces before inducing birds. Reapply as outlined above after each grow-out. Reapply after each sanitizing and washed down of poultry containment area to continue beetle control.

Directions for Applying in New and Existing Construction to Control Cockroaches and other Target Insects: When treating large areas, such as wall voids, soffit and subcabinet voids in new and existing construction, dust liberally using dusting application equipment.

Directions for Applying in Sewers and Manhole Cavities: Apply this product dry or mixed with water or acrylic polymer for improved adhesion to sewer wall cavity surfaces, at a rate not to exceed 12 oz. per 190 sq. ft. using portable blowers, air pressure tanks or pressurized nozzle(s).

Commercial/Professional**FOOD HANDLING ESTABLISHMENTS**

Use Restrictions: Apply only in areas inaccessible to children and pets. Do not use in edible product areas of food handling establishments, restaurants, or other areas where food is commercially prepared or processed. Do not use in serving areas while food is exposed.

Places other than private residences, in which food or feed is held, processed, prepared, or served.

1. FOOD AREAS (including some serving areas)

Includes areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, and syrups). Also includes some SERVING AREAS.

FOOD SERVING AREA

SERVING AREAS are facilities where food is served, such as dining rooms, but not where food is prepared or held. These areas are considered FOOD AREAS when food is exposed, and the facility is in operation. Follow application directions in this section, if food is not exposed and facility is not in operation, follow application directions under NON-FOOD SERVICE AREAS below.

Use Restrictions: FOOD AREA application is limited to CRACK AND CREVICE TREATMENT ONLY. Applications to other areas are not permitted. **Application directions:** Apply in small amounts directly into cracks and crevices using a bulbous duster or other suitable equipment capable of applying insecticides directly into cracks and crevices, in points between different elements of construction, between equipment and floors, opening leading to voids and hollow spaces in walls, equipment legs and bases, conduits, motor housing and electrical switch boxes where cockroach hide.

2. NONFOOD AREAS (including some service areas)

Includes garbage room, lavatories, floor drains (to sewer), entries and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after canning or bottling). Also includes some SERVING AREAS.

NONFOOD SERVING AREAS

SERVING AREAS are facilities where food is served, such as dining rooms, but not where food is prepared or held. These areas are considered NONFOOD AREAS when food is not exposed, and facility is not in the operation. Follow application directions in this section. If food is exposed and facility is in operation, follow application directions under FOOD SERVING AREAS.

Application Directions: Apply as a spot treatment to selective surfaces such as baseboards, under elements of construction into cracks and crevices. Avoid treatment surfaces likely to be contacted by food.

OTHER NONFOOD AREAS

Application Directions: Apply to baseboard areas, around water pipes, surfaces behind and beneath sinks, lockers, tables, pallets and similar areas where insect hide or through which they may enter.

{Storage and Disposal statements will be placed in box format, space providing, if not in paragraph format.}

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

Pesticide Storage

Store in a dry place. Do not store where children or animals may gain access.

Pesticide Disposal

Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available.

{≤ 1 lb. container-homeowner}: Rinse Thoroughly before discarding in trash.

{less than 50 lb, rigid container}: Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or mix tank. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

{≥ 50 lbs bag}: Completely empty bag into application equipment. The offer for recycling, if available, or dispose of empty bag in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Commercial/Professional

[NOTICE

Because of many varying conditions affecting the use and application, manufacturer warns buyer that these may impair or vary the results or effects of the use of this product, in any event, complete prevention of decay by fungi or other organisms is not guaranteed. Neither manufacturer nor seller shall be liable in respect to any injury or damage suffered by reason the use of this product for purpose not indicated by the label or when used contrary to the directions or instructions hereon nor with respect to breach of any warranty not expressly specified herein. Buyer accepts this material subject to these terms and assumes all risk of usage and handling except when used or handled in accordance with the label. Neither manufacturer not sell makes, and their employees and agents are not permitted to make, any representation or warranties, express or implied by law, not specifically set forth herein.]

Orthoboric Acid	Group:	8D	Insecticide
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Zone Defense®

Kills Roaches

- [Kills Roaches [(including Palmetto Bugs and Waterbugs)]]
- Also Darkling Beetles Ants & Silverfish]

ACTIVE INGREDIENTS:	
Orthoboric Acid	64.0%
OTHER INGREDIENTS	<u>36.0%</u>
Total.....	100.00%

KEEP OUT OF REACH OF CHILDREN
CAUTION

[See [side] [back] panel for additional Precautionary Statements [and First Aid]]

Net Weight: lbs. (kg)

InCide Technologies, Inc.
50 North 41st Avenue
Phoenix, AZ 85009-4618

EPA Reg. No.: 44757-3
EPA Est. No.: 44757-AZ-1
Made in the U.S.A.

1-800-777-4569

Batch Code:

Residential/Domestic**PRECAUTIONARY STATEMENT****HAZARDS TO HUMANS AND DOMESTIC ANIMALS:**

CAUTION: Harmful if swallowed or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

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FIRST AID	
IF SWALLOWED	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have a person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
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Have the product container with you when calling a poison control center or doctor or going for treatment.	

This product may be used in [homes, restaurants, and other food and food handling establishments, markets, schools, offices, hotels, motels, hospitals, nursing homes, garages, grocery stores, apartment buildings, theaters, boats, trains, yachts, camps, mobile homes, buses, zoos, kennels, military bases, libraries, and animal confinement areas].

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Use Restrictions:

- Children and pets should not be in treatment area until after application is complete.
- Do not treat pets with this product.
- Avoid contamination of feed and foodstuff.
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Residential/Domestic

[DOMESTIC (HOWEOWNER) USE]

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2. NONFOOD AREAS (including some service areas)

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Residential/Domestic

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STORAGE AND DISPOSAL

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Pesticide Storage

Store in a dry place. Do not store where children or animals may gain access.

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Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Non-refillable container. Do not reuse or refill this container. Offer for recycling, if available.

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{less than 50 lb, rigid container}: Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or mix tank. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

{≥ 50 lbs bag}: Completely empty bag into application equipment. The offer for recycling, if available, or dispose of empty bag in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[NOTICE

Because of many varying conditions affecting the use and application, manufacturer warns buyer that these may impair or vary the results or effects of the use of this product. In any event, complete prevention of decay by fungi or other organisms is not guaranteed. Neither manufacturer nor seller shall be liable in respect to any injury or damage suffered by reason the use of this product for purpose not indicated by the label or when used contrary to the directions or instructions hereon nor with respect to breach of any warranty not expressly specified herein. Buyer accepts this material subject to these terms and assumes all risk of usage and handling except when used or handled in accordance with the label. Neither manufacturer nor seller makes, and their employees and agents are not permitted to make, any representation or warranties, express or implied by law, not specifically set forth herein.]